

National Aeronautics and Space Administration  
Headquarters  
Washington, DC 20546-0001



January 24, 2008

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the 51<sup>th</sup> Annual  
Goddard Memorial Dinner on March 7, 2008

The National Space Club will hold its 51<sup>th</sup> Annual Goddard Memorial Dinner on March 7, 2008, at the Washington Hilton Hotel in Washington, DC. The National Space Club is a nontechnical and nonprofit organization composed of representatives of industry, Government, educational institutions, and private individuals. Annually, the National Space Club sponsors the Goddard Memorial Dinner honoring the memory of leading American space pioneer Dr. Robert H. Goddard. The main purpose of the Goddard Dinner is to present, in addition to other awards and fellowships, the Goddard Trophy, which is given "for great achievement in advancing space flight programs contributing to United States leadership in astronautics."

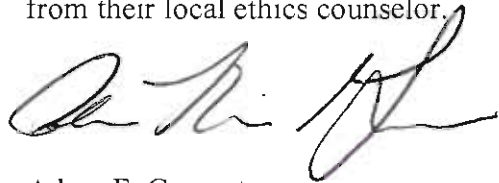
This event will be a widely attended gathering of approximately 2,400 persons, many of whom are involved in NASA projects, and with whom NASA personnel will be involved in the future. The cost per person is \$225. I find that the event meets the requirements of a "widely attended gathering" as defined in 5 CFR § 2635.204(g).

I have determined that free attendance of NASA employees is in the best interests of the Agency because it will further NASA programs and operations. Mr. Neil Armstrong, former astronaut and the first person to walk on the Moon, is the guest speaker for the dinner. The dinner will also give NASA employees the opportunity to discuss the Vision for Space Exploration and a wide variety of other issues related to NASA and its programs with other attendees. Accordingly, NASA employees whose duties do not substantially affect the event sponsor or a majority of all of its members may accept an invitation for free attendance to the event for themselves and their invited spouses or guests.

Note that some NASA contractors may be providing sponsorship for this event and purchasing tables at which the National Space Club may seat other attendees. To avoid the appearance of a conflict of interest, NASA employees who attend the dinner must ensure that they do not sit at a table sponsored by a contractor with which they are closely and currently involved or expect to be involved within the next few months, e.g., by way of source selection or contract administration duties.

It will be sufficient if invited NASA employees provide the names of such contractors to the National Space Club with their RSVPs, registration, or other correspondence and do not sit at the listed companies' tables. (A list of the National Space Club's corporate members is enclosed for reference. It is likely that some of the event sponsors will be entities found on this list.) Employees do not have to list any and all contractors with whom future contact is possible, or contractors with whom they have infrequent contacts on trivial matters. Rather, only contractors with whom they are or will soon be closely involved as described above need be listed. Consequently, it is expected that for most employees, the list of prohibited sources can be kept to a minimum. The final decision on this matter is, of course, left to the employee who has first-hand knowledge of his or her responsibilities.

However, NASA employees whose duties may substantially affect the event sponsor or a majority of its members, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in dark ink, appearing to read 'Adam F. Greenstone', is written over the printed name.

Adam F. Greenstone

Enclosure



# National Space Club

[HOME](#) [ABOUT](#) [PROGRAMS](#) [EVENTS](#) [MEMBERSHIP INFO](#) [CONTACT US](#)

[Corporate Membership Inquiry](#)

[Individual Membership Application](#)

[Corporate Members](#)

## 2006-2007 Corporate Members

The Corporate Members of the National Space Club represent the entire range of companies involved in space activity, from the smallest to the giants of the aerospace industry. You may find more information about each of these companies on their web sites, by following the links provided.

[Accenture, LLP](#)

[Aerojet](#)

[The Aerospace Corporation](#)

[Air Products and Chemicals, Inc.](#)

[ASRC Aerospace Corporation](#)

[Assurance Technology Corporation](#)

[ATK](#)

[AXA Space](#)

[BAE Systems](#)

[Ball Aerospace & Technologies Corp.](#)

[The Boeing Company](#)

[Booz Allen Hamilton](#)

[Computer Sciences Corporation](#)

[GeoEye](#)

[General Dynamics](#)

[Global Science & Technology](#)

[Goodrich Corporation](#)

[Harris Corporation](#)

[Honeywell](#)

[Integrity Applications Incorporated](#)

[International Space Brokers, Inc.](#)

[ITT](#)

[Jackson and Tull](#)

[L-3 Titan Group](#)

[Lockheed Martin Corporation](#)

[ManTech International Corporation](#)

[Northrop Grumman Corporation](#)

[Orbital Sciences Corporation](#)

[QSS Group, Inc.](#)

[Raytheon Company](#)

[Science Applications International Corporation](#)

[Scitor Corporation](#)

[SpaceVest](#)

[Swales Aerospace](#)

[Teledyne Brown Engineering](#)

[United Space Alliance](#)

[Back to top](#)

©2004-2007 National Space Club. All rights reserved.

[info@spaceclub.org](mailto:info@spaceclub.org)